

2013 SEP 27 PM 5:30

CASE UNSEALED PER ORDER OF COURT
SEALED

CLERK
SOUTHERN DISTRICT OF CALIFORNIA

BY 

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

February 2012 Grand Jury

13CR3575 DMS

UNITED STATES OF AMERICA)	Case No. _____
)	
Plaintiff,)	<u>I N D I C T M E N T</u>
)	
v.)	Title 21, U.S.C., Secs. 952, 960,
)	and 963 - Conspiracy to Import
SERAFIN ZAMBADA-ORTIZ,)	Methamphetamine and Cocaine;
aka "Sera,")	Title 21, U.S.C., Sec. 853 -
)	Criminal Forfeiture
Defendant.)	

The grand jury charges:

Count 1

Beginning at a date unknown to the grand jury and continuing up to and including September 27, 2013, within the Southern District of California, and elsewhere, defendant SERAFIN ZAMBADA-ORTIZ, aka "Sera," did knowingly and intentionally conspire with other persons known and unknown to the grand jury to import 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine and 5 kilograms and more of cocaine, both Schedule II Controlled Substances; into the United States from a place outside thereof; in violation of Title 21, United States Code, Sections 952, 960, and 963.

Criminal Forfeiture Allegations

1
2 1. The allegation contained in Count 1 is realleged and by
3 its reference fully incorporated herein for the purpose of alleging
4 forfeiture to the United States of America pursuant to the
5 provisions of Title 21, United States Code, Section 853.

6 2. As a result of the commission of the felony offense
7 alleged in this Indictment, said violation being punishable by
8 imprisonment for more than one year and pursuant to Title 21, United
9 States Code, Section 853(a)(1) and 853(a)(2), defendant SERAFIN
10 ZAMBADA-ORTIZ, aka "Sera," shall, upon conviction, forfeit to the
11 United States all their rights, title and interest in any and all
12 property constituting, or derived from, any proceeds any defendant
13 obtained, directly or indirectly, as the result of the felony
14 offense alleged in this Indictment, and any and all property used or
15 intended to be used in any manner or part to commit and to
16 facilitate the commission of the violation alleged in this
17 indictment.

18 3. If any of the above-described forfeitable property, as a
19 result of any act or omission of the defendant:

- 20 a. cannot be located upon the exercise of due diligence;
21 b. has been transferred or sold to, or deposited with, a
22 third party;
23 c. has been placed beyond the jurisdiction of the Court;
24 d. has been substantially diminished in value; or
25 e. has been commingled with other property which cannot
26 be subdivided without difficulty;

27 //

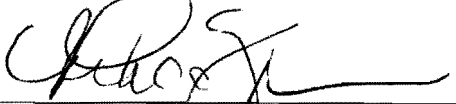
28 //

1 it is the intent of the United States, pursuant to Title 21,
2 United States Code, Section 853(p), to seek forfeiture of any other
3 property of the defendant up to the value of the said property
4 listed above as being subject to forfeiture.

5 All in violation of Title 21, United States Code, Section 853.

6 DATED: September 27, 2013.

7 A TRUE BILL:

8 
9 Foreperson

10 LAURA E. DUFFY
11 United States Attorney

12 By:

13 
14 ADAM L. BRAVERMAN
15 Assistant U.S. Attorney
16
17
18
19
20
21
22
23
24
25
26
27
28